



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
105 SOUTH MERIDIAN
P.O. BOX 6015
INDIANAPOLIS, INDIANA 46206-6015



200011

TO: <i>Paul R. Steedman</i>	TELEFAX #: <i>312 / 353-9176</i>
COMPANY: <i>U. S. EPA</i>	
DIVISION: <i>Emergency Response Branch</i>	TELEPHONE: <i>312 / 353-7615</i>

FROM: <i>Jim Smith</i>	TELEPHONE: <i>317 / 243-5054</i>
COMMISSION & SECTION:	NUMBER OF PAGES (INCLUDING COVER PAGE): <i>6</i>

COMMENTS: <i>5/8/92 - Pof. ARARs for Removal Actions. (Specific to Pnum but applicable to soil/product also)</i>
--

IDEM LOCATION	FAX NUMBER	CONFIRM NUMBER
IDEM Stores and Mail (Basement)	(317)232-5539	(317)232-8568
IDEM File Room (9th Floor)	(317)232-3403	(317)232-3399
IDEM Bradbury (Room 30)	(317)243-5092	(317)243-5011
IDEM Air Management (2nd Floor)	(317)233-3257	(317)232-5586
IDEM Commissioner (OEA, Comm. Legal Use Only)	(317)232-8564	(317)232-8162
Drinking Water Branch (Jackson Square)	(317)233-4165	(317)233-4222
Northwest Regional Office (Gary, IN)	(219)881-6745	(219)881-6712

ARARS FOR DRUM REMOVALS**Overview of Applicable Rules**

- A. Spills of oil and other objectionable substances
327 IAC 2--6
Environmental Response
- B. Contingency Plan
329 IAC 3-18
Solid and Hazardous Waste Management
- C. Response to leaks or spills and disposition of
leaking or unfit-for-use tank systems
329 IAC 24-7
Solid and Hazardous Waste Management
- D. Leaking or unfit-for-use tank systems, response
329 IAC 49-7
Solid and Hazardous Waste Management
- E. Fugitive Dust Emission
326 IAC 6-4
Air Management
- F. Disposal of Special Waste
329 IAC 2-21
Solid and Hazardous Waste
- G. Disposal of hazardous waste
329 IAC 3
Solid and Hazardous Waste
- H. Disposal of PCB waste
329 IAC 4
Solid and Hazardous Waste Management
- I. Safety and personal protection
29 CFR 1910
IOSHA
- J. ~~Ambient Air Quality Standards~~
326 IAC 1-3
Air Management

Summary of Requirements

A. Spills of oil and other objectionable substances
327 IAC 2-6
Environmental Response

For any spill that threatens to enter and damage waters of the state (that may cause or threaten to cause damage to public health, safety or welfare, aquatic biota, animal life, plant life or recreation, domestic, commercial, industrial or agricultural water uses).

1. immediately report spill to OER, (317)243-5155 or emergency center, (317)633-0144
2. notify downstream water user
3. contain spill
4. clean up spill
5. submit reports

B. Contingency Plan
329 IAC 3-18
Solid and Hazardous Waste Management

Existing Hazardous Waste Facility Standards - Contingency Plan and Emergency Procedures. Requires that facilities have a contingency plan which minimizes hazards from fire, explosion, or any unplanned sudden or non-sudden release. Emergency coordinator must notify State and local officials specified in the plan.

Include:

1. name and telephone number of reporter
2. name and address of facility
3. time and type of incident
4. name and quantity of materials involved
5. extent of injuries
6. possible hazards to human health/environment outside facility

Within 15 days, submit written report to include:

1. ~~name, address~~ and phone number of owner or operator
2. name, address and phone number of facility
3. date, time and type of incident
4. name and quantity of materials involved
5. extent of injuries
6. assessment of actual or potential hazards to human health/environment
7. estimated quantity and disposition of recovered material that resulted from incident

C. Response to leaks or spills and disposition of
leaking or unfit-for-use tank systems.

329 IAC 24-7

Solid and Hazardous Waste Management

See next item.

D. Leaking or unfit-for-use tank systems, Response

329 IAC 49-7

Solid and Hazardous Waste Management

Same requirements as 24-7. Responsible party must:

1. Prevent additional leakage
2. Inspect system and determine cause of release
3. remove waste from tank system within 24 hours or as soon as practicable
4. immediately contain visible releases, conduct visual inspection of release and,
 - i. prevent further migration and
 - ii. remove and properly dispose of visible contamination
5. Unless spill was <1 lb. and was cleaned up immediately, report within 24 hours to IDEM. Same items as 3-18.
6. Within 30 days, submit written report containing:
 - i. likely route of migration of release
 - ii. characteristics of surrounding soil
 - iii. results of monitoring or sampling conducted
 - iv. proximity to down gradient drinking water, surface water, and population areas
 - v. description of response actions taken or planned

E. Fugitive Dust Emission

326 IAC 6-4

Air Management

No visible emissions allowed across the property line.

F. Disposal of Special Waste

329 IAC 2-21

Solid and Hazardous Waste

~~Defines special waste~~ and requires that it be characterized and certified as special waste before it can be disposed. The characterization follows the procedures used for characterization of hazardous waste. Indiana has not yet adopted the TCLP method of analysis. EPTox is required by Indiana until TCLP is adopted, probably in September, '91. If the waste (soil or debris, disposable equipment or clothing, etc.) is hazardous it must be disposed of in accordance with the Hazardous Waste Management Rules, 329 IAC 3.

G. Disposal of hazardous waste
329 IAC 3
Solid and Hazardous Waste Management

Only exceed federal rules in administrative and financial assurance requirements. Indiana has not yet adopted the TCLP for determining characteristic hazardous waste, therefore EPTox will be required. Indiana also has its own manifest.

H. Disposal of PCB waste
329 IAC 4
Solid and Hazardous Waste Management

Allows disposal in landfill of <50 ppm PCBs or PCB articles in limited amounts specified in the rule.

I. Safety and personal protection
29 CFR 1910
IOSHA

Worker protection rules are administered by IOSHA. They do not exceed Federal requirements.

J. Ambient Air Quality Standards
326 IAC 1-3
Air Management

This rule establishes primary and secondary ambient air quality standards necessary to protect public health and welfare for total suspended particulates (TSP), particulate matter with a nominal diameter less than 10 microns (PM₁₀), lead, ozone, nitrogen dioxide (NO₂), sulfur dioxide (SO₂) and carbon monoxide (CO). These standards are shown below.

Pollutant	Time of Average	NAAQS	
		Primary	Secondary
Particulate matter (PM ₁₀)	Annual arithmetic average	50 ug/m ³	Same
	24 hour	150 ug/m ³	Same
Particulate matter (TSP)	Annual geometric mean	75 ug/m ³	60 ug/m ³
	24 hour	260 ug/m ³	150 ug/m ³
Sulfur dioxide	Annual arithmetic mean	80 ug/m ³	None
	24 hour	365 ug/m ³	None
	3 hour	None	1300 ug/m ³
Carbon monoxide	8 hour	10 ug/m ³	Same
	1 hour	40 ug/m ³	Same
Ozone	1 hour/day	235 ug/m ³	Same
Nitrogen dioxide	Annual arithmetic mean	100 ug/m ³	Same
Lead	Quarterly arithmetic mean	1.5 ug/m ³	Same

Measured at 25°C and 760 mm of Hg.